

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR BROWARD
COUNTY, FLORIDA

COMERICA BANK,
a Texas banking association,

CASE NO. 11-028447 (03)

Plaintiff,

vs.

OCEAN 4660, LLC a Florida limited liability
company, OCEANSIDE LAUDERDALE, INC., a
Florida corporation, KENNETH A. FRANK,
individually, ANGELA DIPILATO, individually,
TOWN OF LAUDERDALE-BY-THE-SEA, a
political subdivision of the State of Florida, WASTE
MANAGEMENT INC. OF FLORIDA d/b/a
SOUTHERN SANITATION SERVICE, a Florida
corporation, AFFINITY MECHANICAL INC., a
Florida corporation, and BROWARD COUNTY, a
political subdivision of the State of Florida,

Defendants.

PLAINTIFF'S MOTION FOR CLERK'S DEFAULT

Plaintiff Comerica Bank, moves for entry of a Default by the Clerk against Defendant
BROWARD COUNTY for failure to serve any papers on the undersigned or file any papers as
required by law.

WE HEREBY CERTIFY that no paper from **BROWARD COUNTY** has been filed or served
on the Plaintiff's attorney prior to the time of filing this Motion for Clerk's Default.

Dated: December 9, 2011.

HOLLAND & KNIGHT LLP
Counsel for Plaintiff
515 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301
954-525-1000 (telephone)
954-463-2030 (fax)

By: 

Brian K. Hole
Florida Bar No. 0019968
Nicole C. Velasco
Florida Bar No. 0028585

IN THE CIRCUIT COURT OF THE 17TH
JUDICIAL CIRCUIT IN AND FOR BROWARD
COUNTY, FLORIDA

COMERICA BANK,
a Texas banking association,

CASE NO. 11-028447 (03)

Plaintiff,

vs.

OCEAN 4660, LLC a Florida limited liability
company, OCEANSIDE LAUDERDALE, INC., a
Florida corporation, KENNETH A. FRANK,
individually, ANGELA DIPILATO, individually,
TOWN OF LAUDERDALE-BY-THE-SEA, a
political subdivision of the State of Florida, WASTE
MANAGEMENT INC. OF FLORIDA d/b/a
SOUTHERN SANITATION SERVICE, a Florida
corporation, AFFINITY MECHANICAL INC., a
Florida corporation, and BROWARD COUNTY, a
political subdivision of the State of Florida,

Defendants.

DEFAULT

A default is entered in this action against Defendant **BROWARD COUNTY** for failure to
serve or file any papers in this action as required by law.

HOWARD C. FORMAN
Clerk of Court

Dated: _____

By: _____
Deputy Clerk

Copies furnished:

Brian K. Hole, Esq.
Holland & Knight LLP
515 East Las Olas Boulevard
Suite 1200
Fort Lauderdale, FL 33301

Oceanside Lauderdale, Inc.
c/o Edward J. Bender, Registered Agent
2805 E. Oakland Park Boulevard, #144
Fort Lauderdale, FL 33306

Kenneth A. Frank
2310 East Atlantic Boulevard, Suite 206
Pompano Beach, FL 33062

Town of Lauderdale-By-The-Sea
c/o Mayor Roseann Minnet
4501 Ocean Drive
Lauderdale-By-The-Sea, FL 33308

Waste Management of Florida d/b/a Southern Sanitation Service
c/o Registered Agent, CT Corporation System
1200 South Pine Island Road
Plantation, FL 33324

Affinity Mechanical Inc.
c/o Edward J. Bender, Registered Agent
2805 E. Oakland Park Boulevard, #144
Fort Lauderdale, FL 33306

Broward County
c/o Mayor John E. Rodstrom, Jr.
Broward County Commission Offices
115 S. Andrews Avenue
Room 421
Fort Lauderdale, FL 33301